

FCC Received January 3 1994 @ 5:10 p.m.
Dana G. Bradshaw

ORIGINAL

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

TRANSCRIPT OF PROCEEDINGS

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

In the matter of:

TRINITY BROADCASTING OF FLORIDA, INC.
and
GLENDALE BROADCASTING COMPANY

Miami, Florida

MM DOCKET NO. 93-75

RECEIVED

JAN 10 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

DATE OF HEARING: December 16, 1993

VOLUME: 18

PLACE OF HEARING: Washington, D.C.

PAGES: 2596-2769

FREE STATE REPORTING, INC.
Court Reporting Depositions
D.C. Area (301) 261-1902
Balt. & Annap. (410) 974-0947

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED
JAN 10 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

-----)
In the matter of:)

TRINITY BROADCASTING OF FLORIDA, INC.)
and)
GLENDALE BROADCASTING COMPANY)

Miami, Florida)
-----)

MM DOCKET NO. 93-75

The above-entitled matter come on for hearing
pursuant to Notice before Judge Joseph Chachkin,
Administrative Law Judge, at 2000 L Street, N.W., Washington,
D.C., in Courtroom No. 3, on Thursday, December 16, 1993,
at 9:18 a.m.

APPEARANCES:

On behalf of Trinity Broadcasting of Florida, Inc., et al:

NATHANIEL F. EMMONS, Esquire
CHRISTOPHER HOLT, Esquire
EUGENE MULLIN, Esquire
HOWARD TOPEL, Esquire
Mullin, Rhyne, Emmons and Topel
1000 Connecticut Avenue, Suite 500
Washington, D.C.

On behalf of Glendale Broadcasting Company:

LEWIS I. COHEN, Esquire
JOHN SCHAUBLE, Esquire
Cohen and Berfield, P.C.
Board of Trade Building
1129 20th Street, N.W.
Washington, D.C. 20036

On behalf of the S.A.L.A.D.:

DAVID E. HONIG, Esquire
DAVID MCCURDY, Esquire
1800 N.W. 187th Street
Miami, Florida 33056

FREE STATE REPORTING, INC.
Court Reporting Depositions
D.C. Area (301) 261-1902
Balt. & Annap. (410) 974-0947

1 APPEARANCE (Continued):

2 On behalf of the Mass Media Bureau:

3 JAMES W. SHOOK, Esquire
4 GARY SCHONMAN, Esquire
5 Mass Media Bureau
2025 M. Street, N. W. Suite 7212
Washington, D.C. 20554

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

I N D E X

1					
2					
3	<u>Witness</u>	<u>Direct</u>	<u>Cross</u>	<u>Redirect</u>	<u>Recross</u>
4	Dr. Paul Crouch				
5	By Mr. Shook		2599		
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24	Hearing Began: 9:18 a.m.		Hearing Ended: 4:00 p.m.		
25	Lunch Began: 12:35 p.m.		Lunch Ended: 1:45 p.m.		

P R O C E E D I N G S

(9:18 a.m.)

JUDGE CHACHKIN: On the record.

CROSS-EXAMINATION

BY MR. SHOOK:

Q Thank you, Your Honor. Dr. Crouch, could you please turn to Mass Media Exhibit 70 which is in the second volume.

A Yes, sir, I'm there.

Q All right, would you please look at the first paragraph which lists the companies that are in attendance at this meeting.

A Yes, sir, I see that.

Q Would it be fair to characterize the companies at this meeting as owned and operated companies according to the definition that you have for that term?

A It would be the owned and operating companies plus Translator TV, Inc, Community Educational Television in which certainly Trinity has an interest but I would not classify them as owned and operated.

Q Now, is that because they do not meet your definition of owned and operated or is there some other reason?

A It simply means that a majority of the Trinity board is not necessarily a majority of the -- certainly the Translator TV company and at this particular date I'm not sure if a majority of the Trinity board was a majority of the

1 Community Educational Television, it may have been, I'm not
2 sure.

3 Q Well, let's look at the bottom of page 1 and it
4 carries over to page 2 and that has a listing of the persons
5 who are directors of each of the companies. Now, I'm not
6 going to ask you to focus on New York, Indiana, etc., I would
7 just like you to look at the commonality between Trinity
8 Broadcasting Network, Translator TV, Inc. and Community
9 Educational Television.

10 A Well, I see a long listing of people attending and
11 directors of -- what is the question?

12 Q Well, the question is that looking at the directors
13 who are there, would you -- would it still be your testimony
14 that Translator TV, Inc. and Community Educational Television
15 are not present at this meeting as owned and operated
16 companies of Trinity?

17 A Well, this was simply the combined network directors
18 meeting, the annual directors meeting and yes, Translator TV,
19 Inc.'s directors are there but at this point, by my definition
20 at least, Translator TV, Inc., not having a majority of the
21 Trinity board members would not be classified in my opinion as
22 a wholly-owned and operated company as would I classify
23 Trinity of Arizona, for example.

24 Q Oh, I see, now, is this because -- or, just so I
25 understand your answer, is this because the Trinity board now

1 has four persons which include Mr. Juggert and your wife and
2 neither Mr. Juggert nor your wife is a director of Translator
3 TV, Inc., so that's why you're making that distinction?

4 A Yes.

5 Q Would that also be the case with respect to
6 Community Educational Television or is there some other
7 reason?

8 A Simply I suppose because Community Educational
9 Television is a completely another whole class of station. It
10 was certainly an entity in which Trinity had an interest. At
11 this point, I'm not 100 per cent sure the board of CET has
12 changed somewhat through the years and at this point I'm not
13 quite sure if a majority of the Trinity board is a majority of
14 the CET board.

15 Q I see, would it be then that the reason for not
16 viewing Community Educational Television as an owned and
17 operated company of Trinity because Community Educational
18 Television was formed solely to hold non-commercial
19 educational television licenses?

20 A Absolutely.

21 Q Now, turning to page 2, the first paragraph, it's a
22 carry-over from the paragraph that begins in page 1, six lines
23 up from the bottom, it reads, "Jane Duff was present
24 representing the same corporations as Paul Crouch." Am I to
25 understand from that that Jane Duff was a director of all the

1 companies that are listed for which you are also a director.

2 It that what that sentence means?

3 A This is 1984?

4 Q Yes, sir.

5 A I'm not sure if Mrs. Duff had on this date resigned
6 from the Trinity board.

7 Q Well, I can help you there, she doesn't resign for
8 another eight months.

9 A Okay, so then that would be a fair statement, I
10 believe she was representing then both Translator TV, Inc. as
11 well as Trinity.

12 Q Well, the point that I wish to clarify is not so
13 much that she was there on behalf of Trinity Broadcasting
14 Network as well as Translator TV but that she was also there
15 as a director of Florida, Oklahoma City, Arizona, Indiana, New
16 York --

17 A Well, the record says she was present representing
18 the same corporations as Paul Crouch, so I have to assume that
19 she was representing all of the Trinity corporations as well
20 as Translator TV, Inc.

21 Q Well, this brings us to an interesting situation.
22 You may recall from yesterday that we had touched upon the
23 minutes of the 1983 combined annual meetings and Jane Duff was
24 listed as present on behalf of the various corporations that
25 attended which, at the time, included Arizona, Oklahoma City,

1 Indiana, etc. and you may also recall from yesterday that
2 there was a letter in the record that we discussed very
3 briefly and that was Jane Duff's addition as assistant
4 secretary and a director of Arizona. Do you remember that?

5 A Yes, sir.

6 Q Now, if I recall your testimony, you couldn't
7 remember how it was that Jane Duff became a director of
8 Arizona. In fact, that seemed to be even a bit of a surprise
9 to you. Now, with what we have today and with what we saw for
10 the '83 meeting, can you give us -- can you shed any light on
11 how it is apparently that Mrs. Duff has also become a director
12 of these other corporations that we have just gone through,
13 Indiana, New York, etc.?

14 A I'm not sure I can, Mr. Shook, I certainly believed
15 and understood Mrs. Duff to be an officer and assistant
16 secretary as we've talked so often for signatory purposes but
17 I'll just have to be very honest with you, I -- it -- I did
18 not recall her actually being also included as an actual board
19 member, voting board member but apparently that is the case
20 and the record certainly confirms that so I accept it.

21 Q Well, it's puzzling in the sense that, you know, you
22 were the president of all of these organizations and I would
23 have to presume that as president that you would be the person
24 most likely to be aware of, you know, who was a director or
25 not of those particular corporations and how that person got

1 there.

2 A Well, Mr. Shook, have you read this very lengthy
3 paragraph and all of the many names and the twenty years of
4 directors, some of whom have come and gone and come up and
5 gone off and been officers and directors, I think I need a
6 little mercy here, perhaps.

7 Q Well, let us assume for the moment because the
8 record seems to reflect that Mrs. Duff is, in fact, a director
9 of these various organizations, would it help your memory if
10 the addition of Mrs. Duff to these boards was in some way
11 related to your desire which had been expressed with her
12 addition to the TBN board that she be added to these various
13 boards in order to further what you understood to be the
14 Commission's policy of involving or integrating, whichever
15 word would be more appropriate, a minority individual into the
16 ownership and management of various Trinity companies.

17 A Well, that certainly would have been one of the
18 goals.

19 Q But that does not help your memory at all.

20 A No, sir.

21 Q Moving to the first full paragraph of page 2, it
22 reflects that your wife was absent from the meeting but had --
23 but was represented through a proxy to yourself, do you see
24 that?

25 A Yes, sir.

1 Q Now, I just want to clarify something and I don't
2 intend to beat this to death, but am I to understand that this
3 was a common practice, that basically meetings, not only
4 annual meetings, but also special meetings that more likely
5 than not Janice was not physically present but had simply
6 given you her proxy.

7 A Typically what happened, Mr. Shook, is I did
8 represent her through her proxy, she would generally stop by
9 at least once during the session to give a word of greeting
10 and maybe give a brief report on some of the network
11 activities but whether that occurred in this case, I am not
12 sure.

13 Q The next paragraph, who is Julie Arguinzoni?

14 A Julie Arguinzoni represents, I believe, at that time
15 was a member of Community Educational Television and also
16 produced a television program for Trinity Broadcasting.

17 JUDGE CHACHKIN: By the way, Arguinzoni is
18 A R G U I N Z O N I.

19 BY MR. SHOOK:

20 Q And she is the wife of Sonny Arguinzoni?

21 A Yes, sir.

22 Q She's also, meaning Julie, was an employee of
23 Trinity Broadcasting Network?

24 A I don't recall if she was a full-fledged employee or
25 if she was simply retained to do a particular program. I just

1 don't recall.

2 Q Was she ever an employee?

3 A She may have been but I'm not 100 per cent sure.

4 Q Now, turning to pages 2 and 3 for the list of
5 companies -- actually if we also include page 4, in the list
6 of companies Mrs. Duff appears as a vice president or a first
7 vice president or in the case of New York, which appears on
8 page 4, a second vice president. Now, with all of these
9 companies, was there a separate election conducted for each of
10 these companies or was this something where it all happened in
11 a group and there was sort of a group election to the various
12 offices?

13 A Typically Mr. Juggert who was keeping the minutes
14 for Trinity and I think in some cases assisting Mrs. Duff and
15 keeping the minutes for TTI, my memory says that the list was
16 read, time given for any questions, suggestions, etc. and then
17 my memory says that it was done by a general group vote.

18 Q More or less by acclimation?

19 A Pretty much.

20 Q Would it be fair to say that the officers were
21 basically known before hand and the process of choosing them
22 was simply one to go through the motions in a way and have
23 verified for the record that such was the case because there
24 was no real question about who was going to be an officer or
25 director, was there?

1 A This is pretty typical, Mr. Shook, of any church-
2 related business meeting or operation or election of officers,
3 yes, sir.

4 Q Now, turning to page 5, the fourth paragraph down,
5 it says "Mrs. Duff reported that she had mailed letters to
6 parties who hold construction permits for translators that
7 might be available for acquisition." I take it she did this
8 on behalf of Trinity Broadcasting Network and not Translator
9 TV, Inc.?

10 A Only she could answer that definitively but I do
11 believe that is the case.

12 Q And you have no reason to believe otherwise.

13 A No, sir.

14 Q With respect to the next paragraph, "The board
15 members then returned their attention to the financial
16 statements." Obviously there was a reference to the financial
17 statements earlier but the reason I'm focusing on this
18 particular statement is that it suggests that everyone had in
19 hand a financial statement to look at that they went over it,
20 would that be fair to say?

21 A Yes, Mr. Shook, this was not only a combined
22 corporate business meeting but it was pretty much a network-
23 wide meeting where all the affiliates are invited to attend
24 and I think it's a fair statement that at least within arms
25 reach a report was available to virtually anyone who wished to

1 see it.

2 Q Do you have any recollection of there being any
3 discussion with respect to the situation of Translator TV,
4 Inc.?

5 A I don't have any particular recollection, no, sir.

6 Q Now, I'd like you to turn to -- please turn to page
7 6, three paragraphs from the bottom, it says, "Mr. Crouch
8 reported that the issuance of a construction permit for the
9 Harlingen, Texas project of Community Educational Television
10 was about to be issued, broadcasting should begin shortly
11 thereafter" and then, not the next paragraph but the paragraph
12 after that, "After Harlingen is granted, numerous other
13 additional entities will be sought through Community
14 Television." Now, at this time then there is a plan
15 apparently in the works for Community Educational Television
16 to acquire as many television permits as possible that were
17 going to broadcast non-commercial educational programming?

18 A Yes, sir.

19 Q At the outset, though, there was going to be some
20 arrangement of some kind with Trinity with respect to
21 programming?

22 A It was always understood that the Community
23 Educational Stations would be an affiliate of the Trinity
24 Broadcasting Network, recognizing, of course, the unique
25 programming requirements of a non-commercial station.

1 Q Now, with the use of the word affiliate in this
2 context, does that mean that at some point in time, and I
3 recognize from what we're reading here that with the issuance
4 of the construction permit being imminent that we're not yet
5 to the stage of a station being on the air and there being
6 programming, did there come a time when there was a written
7 affiliation agreement between Trinity Broadcasting Network and
8 Community Educational Television?

9 A Mrs. Duff handled those affiliation agreements but
10 to the best of my knowledge, yes, there was and I believe is
11 today a written affiliation agreement with the CET station.

12 Q Are you aware of the payment arrangement for
13 carriage of Trinity Broadcasting programming?

14 A I believe it was the typical affiliation agreement
15 whereby the zip code remuneration derived from the coverage of
16 that station was divided 80 per cent for the station and 20
17 per cent for the network.

18 Q Now, I'd like you to turn to page 8 --

19 A Yes, sir.

20 Q -- the second paragraph, do you see the reference
21 there to TriState Television?

22 A Yes.

23 Q Now, here TriState Television is identified as an
24 unaffiliated corporation. Now, can you tell us what that
25 means in that context?

1 A Well, perhaps that corporation had not yet entered
2 into a full affiliation arrangement, I'm really not too sure.

3 Q So you wouldn't say that the identification of
4 TriState as an unaffiliated corporation is related to the fact
5 that its directors have no commonality with Trinity directors,
6 that the lack of affiliation is due to something else?

7 A Yeah, I think this could very well point up, Mr.
8 Shook, the perhaps mixing of these terms. Unaffiliated in
9 this context may have meant that there was absolutely no
10 commonality of board of directors which there was not and is
11 not or I suppose it could simply mean that a written
12 affiliation agreement had not yet been entered into, I'm just
13 not sure.

14 JUDGE CHACHKIN: You're just speculating about this
15 though, you don't know what this means, is that what you're
16 saying?

17 MR. CROUCH: Yes, sir.

18 BY MR. SHOOK:

19 Q Yes, and for purposes of my questioning, I
20 understand you did not write this but I was exploring whether
21 or not you had any knowledge and if you don't, that's fine.

22 A I'm just not sure.

23 Q Now, I'd like you to turn to pages 9 and 10 and I
24 will focus you on the particular paragraphs that I'm
25 interested in. Specifically the last paragraph on page 9 and

1 the first paragraph on page 10, just read that to yourself.

2 A Yes, sir, I've read them.

3 Q Now, do you know, and so in this case I'm not asking
4 you to guess or speculate, but do you know whether the
5 affiliation that is referenced on page 10 where it says "an
6 interest to be affiliated with Trinity if the station is
7 purchased was expressed", if that affiliation is supposed to
8 be a programming affiliation or something else?

9 A My understanding would be that this would have been
10 simply a program affiliation.

11 Q Now, turning to page 11, I would like to clarify
12 something. Under new ordinations, do you see there's a
13 listing of names beginning with Carl Brady?

14 A Yes, sir.

15 Q The second to the last name, Tim Trader?

16 A Yes.

17 Q Now, is that Lois Trader's husband?

18 A Yes.

19 Q Who in turn we know Lois Trader was Reverend
20 Aguilar's secretary.

21 A Yes.

22 Q Now, is Tim Trader an employee of TBN?

23 A Yes, he is.

24 Q And he was at the time of the ordination here?

25 A Yes.

1 Q And so his employment has been continuous?

2 A I believe he is to this day an employee.

3 Q I'd like to turn to Mass Media Exhibit 71.

4 A Yes, sir.

5 Q Under the first resolved paragraph there is a
6 reference to a loan of up to \$1.5 million dollars to TriState
7 Broadcasting, do you see that?

8 A Yes, sir.

9 Q Now, that loan was going to be evidenced by a note,
10 was it not?

11 A Yes.

12 Q I'd like you to turn to Mass Media Exhibit 72.

13 A Yes.

14 Q Now, note first if you will that the certifications
15 that we have are for Philadelphia, Columbus, Ohio and St.
16 Louis, Missouri and that would appear on pages 1, 3 and 5,
17 those would be the easiest way to find the references.

18 A Yes, sir, I see that.

19 Q Do you have any knowledge as to whether there were
20 the only certifications filed on behalf of Translator TV, Inc.
21 or pending Translator applications?

22 A The question again, sir, was?

23 Q All right, here we have three certifications and I
24 can explain to you that the certifications are to note that
25 the company should have a minority preference as well as a

1 diversification preference and what we have is three prefer --
2 three certifications for those preferences and what I'm asking
3 you is, to your knowledge, are these the only three that
4 Translator TV, Inc. filed at this time or at any other time?

5 A There may have been more at a later date but I'm
6 just not certain of that.

7 Q Now, because they're identical I don't need to
8 belabor this, we can go over one of them and it will suffice.

9 A Um-hum.

10 Q If you would turn to the second page, in the middle
11 of the page do you see "certification of preferences"?

12 A Yes, sir.

13 Q And following that is minority and then there is a
14 No. 1?

15 A Yes.

16 Q And after "yes" an "x" is placed in the line?

17 A Yes, sir.

18 Q Do you recall having any discussion with anyone as
19 to whether or not it was proper to claim this preference?

20 A I don't recall any specific conversation, I think it
21 was just well-known to all of us that the original purpose of
22 TTI, later National Minority, was that if and when the
23 Commission ever did through its policies create this
24 preference that it certainly would be claimed and apparently
25 this now is the case.

1 Q I'd like to move to the diversification preference
2 and specifically No. 2 because that's the only question that
3 has any bearing here and I'm not asking for your understanding
4 of that that means at this time, what I'm asking you is
5 whether or not you can recall any discussion with anyone as to
6 whether or not it was proper to answer the question noted as
7 it was answered.

8 A I recall no discussion in that regard at all, Mr.
9 Shook, and I'll be honest with you, I'm not sure today if I
10 fully understand the diversification preference.

11 Q Now, as I went through in the beginning, these are
12 for Philadelphia, Columbus, Ohio and St. Louis. Also at the
13 time there was an application of Translator TV, Inc. pending
14 for a station in the Houston market, do you have any knowledge
15 as to why apparently no such certification was filed there?

16 A I have no idea.

17 Q Please turn to Mass Media Exhibit 73.

18 A Yes, sir.

19 Q Now, down at the bottom there is a name "Paul" that
20 appears, I take it that "Paul" is you?

21 A Yes, sir.

22 Q In the middle of this first page, the paragraph
23 beginning "but partners, this is only the beginning", do you
24 see that?

25 A I'm there.

1 Q All right, that's not the sentence I would like you
2 to focus on, the sentence I would like you to focus on is two
3 sentences later, beginning with "we are filing for educational
4 stations in many areas", do you see that?

5 A Yes, sir.

6 Q Now, in the context of this newsletter, can you
7 explain to us who is "we"?

8 A As I explained yesterday, generally when I'm writing
9 to the partners and the supporters and the viewers of Trinity,
10 when I say "we" I'm talking about "we" as a group of believers
11 who are seeking to build a network. In this context, we may
12 have had a secondary meeting meaning Community Educational
13 Television.

14 Q Would "we" have also possibly had a third meeting
15 which is Community Educational Television plus Trinity
16 Broadcasting Network?

17 A I think it would have included the broadest range of
18 the network.

19 Q Please turn to Mass Media Exhibit 76 and focus first
20 on the date, this is May 1984.

21 A Yes, sir.

22 Q And apparently this is telethon month, if you turn
23 to page 3 there was going to be a telethon run in May?

24 A Yes, sir.

25 Q And if you would turn then to page 5, the right-hand

1 column, second entry, do you notice that Reverend Espinoza is
2 noted here again as a director of our satellite division or
3 board member of our satellite division?

4 A Yes, sir, I see that.

5 Q Now, we're up to May 1984, is your answer basically
6 the same as yesterday in terms of your involvement here, that
7 you did not write the caption and you don't remember
8 specifically reviewing this but that as a general matter you
9 would have reviewed the newsletter prior to its release?

10 A Yes, sir, and I think this simply points up again
11 perhaps the confusion of terminology, satellite, affiliate,
12 may have been interchangeable, even in my own mind at that
13 time.

14 Q And again it would be the case that if the project
15 appeared in the newsletter as a special project for the
16 upcoming telethon that it was likely that money was raised for
17 the specific purposes that are noted for each special project?

18 A Yes, and, of course, in this case the solicitation
19 is for Pastor Espinoza's television program, Felicidad.

20 Q Please turn to Mass Media Exhibit 77.

21 A Yes, sir.

22 Q Now, at the outset I recognized this letter as not
23 to you but the part that I'm focusing on and asking for, you
24 know, your knowledge or lack thereof is the reference in the
25 second sentence following "Dear Jane, as has become our

1 custom", were you aware of what, if any, custom existed
2 relative to Colby May's communications with Trinity relative
3 to Commission actions?

4 A Apparently it had become Mr. May's custom to send
5 this type of information to Mrs. Duff.

6 Q And that's as much as you know about it. What I'm
7 looking for, sir, is whether you have any knowledge as to Mr.
8 May's custom or lack thereof to keep Trinity informed of
9 Commission action as expeditiously as possible.

10 A I was generally aware that it was Mr. May's custom
11 to communicate with Mrs. Duff with regarding a wide range of
12 agency matters but I have no specific information if that's
13 what you're asking.

14 Q Well, so that Mr. May's point of contact with Mrs.
15 -- was Mrs. Duff and then if she, in turn, felt that something
16 was significant, she would bring it to your attention?

17 A Yes, sir, I believe that to be a fair statement.

18 Q But it was not necessarily the case or not the case
19 that Mr. May would communicate directly with you?

20 Q That is true.

21 Q And this would include information relative to all
22 corporations in which TBN was involved which at this time
23 included Translator TV, Inc.?

24 A Yes, sir, my memory in this is that Mr. May would
25 have communicated with me directly only if it were a very,

1 very important situation.

2 Q Does -- were you going to ask something?

3 JUDGE CHACHKIN: I didn't say anything.

4 BY MR. SHOOK:

5 Q Oh, excuse me. Do you have any examples in mind
6 right now of what would have been an important matter for Mr.
7 May to talk to you directly about?

8 A Oh, if the Commission had granted a full-power
9 allocation or something along those lines it would be
10 noteworthy, newsworthy that I might wish to use on the air,
11 for example.

12 Q Please turn to Mass Media Exhibit 80.

13 A Yes, sir, I'm there.

14 Q Now, Mass Media Exhibit 80 consists of two pages and
15 there there is a related action in Mass Media Exhibit 81 which
16 also consists of two pages so -- and they're all very short so
17 you can look at all of them basically at the same time.

18 A Yes, I'm there.

19 Q Now, we have the resignation requests of Mrs. Duff
20 relative to the network in Florida and likewise the acceptance
21 of that resignation of the network in Florida. Do you have
22 any knowledge as to whether Mrs. Duff's resignations also
23 covered resignations from the boards of Arizona, Oklahoma
24 City, New York, Indiana? They won't be found in these letters
25 so --

1 A Since it is my understanding that she is not a
2 member of those boards today, I have to believe that other
3 documents may exist in which she did resign from those other
4 boards as well.

5 JUDGE CHACHKIN: Mr. Shook, is this something that'd
6 be subject to stipulation? I assume you want the information
7 as --

8 MR. SHOOK: It's conceivable, I can discuss that
9 with Mr. Topel at the break.

10 JUDGE CHACHKIN: All right.

11 BY MR. SHOOK:

12 Q Please turn to Mass Media Exhibit 82.

13 A Yes, sir.

14 Q Now, this is October 1984 and if you turn to page 3
15 you will note that what follows is apparently for the upcoming
16 telethon.

17 A Yes, sir.

18 Q Now, please turn to page 12.

19 A I'm there.

20 Q Right-hand column, third entry.

21 A Yes, sir, I see that.

22 Q This is the same situation as we have had in other
23 newsletters, that you don't recall specifically writing,
24 editing or anyway involved in the caption but that you
25 probably would have reviewed this letter prior to its going